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*Attorneys for Defendant
Apartment Management Consultants, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Realtor,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO COMPLAINT**

(Second Request)

1 Plaintiff Peggy Thornton (“Plaintiff”) and Defendant Apartment Management Consultants,
2 LLC (“Defendant” or “AMC”) (collectively, the “Parties”), by and through their undersigned
3 counsel, for good cause shown, hereby stipulate and agree to extend AMC’s deadline to file its
4 response to Plaintiff’s Complaint [ECF No. 1] from February 21, 2023, to March 10, 2023 for the
5 following reasons:

- 6 1. Plaintiff filed the Complaint on June 14, 2021 [ECF No. 1].
- 7 2. The Complaint was unsealed on December 9, 2022 upon the United States’
8 declining intervention [ECF No. 18].
- 9 3. AMC’s response to the Complaint was originally due on January 18, 2023.
- 10 4. The Parties had informally agreed to extend the deadline to respond to February 1,
11 2023 prior to AMC’s retaining counsel.
- 12 5. Undersigned counsel, Snell & Wilmer L.L.P. was retained to represent AMC on or
13 about January 26, 2023.
- 14 6. The Parties previously stipulated to extend the deadline for AMC to respond to the
15 Complaint to and including February 21, 2023.
- 16 7. The Parties now agree to allow AMC an additional extension of time to respond to
17 the Complaint, which request is supported by good cause.
- 18 8. While AMC and its counsel have worked diligently to evaluate the allegations in the
19 Complaint, they require modest additional time.
- 20 9. As AMC is not presently the property manager, it is taking additional time to locate
21 relevant documentation. At the same time, undersigned counsel and their core litigation team has
22 faced some personal obstacles that have impeded their ability to work, including the post-partum
23 hospitalization of a spouse and a school-age child currently suffering from COVID.
- 24 10. No other defendant has yet appeared. This extension request is sought in good faith
25 and is not made for the purpose of delay.

26 ///

27 ///

1 THEREFORE, the Parties respectfully request an extension for AMC to file its response to
2 the Complaint until March 10, 2023.

3 Dated: February 21, 2023

Dated: February 21, 2023

4 NEVADA LEGAL SERVICES, INC.

SNELL & WILMER L.L.P.

5 By: /s/Elizabeth S. Carmona

By: /s/Kelly H. Dove

6 Elizabeth S. Carmona, Esq.

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7 Kristopher S. Pre, Esq.

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10 Attorneys for Plaintiff Peggy Thornton

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11 Attorneys for Defendant Apartment
12 Management Consultants, LLC

13 **ORDER**

14 **IT IS SO ORDERED**

15 **DATED:** 5:45 pm, February 22, 2023

16 

17 **BRENDA WEKSLER**

18 **UNITED STATES MAGISTRATE JUDGE**

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE RESPONSE TO COMPLAINT** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED February 21, 2023

/s/ Maricris Williams
An employee of SNELL & WILMER L.L.P.

4891-1097-8386